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February 20, 2018

Hon. Douglas Arpert
District Court of New Jersey
402 East State Street
Trenton, NJ 08608

Re: Globe Life v. Alex Jean et. al., 17-cv-12144(BRM)(DEA)

Dear Judge Arpert:

I represent the interpleader defendants Alex Jean and Marjorie Johnson. I am writing to seek an extension of time to file an (1) answer and (2) reply to the cross-claims asserted against them by co-defendant Samuel Louis (or, more accurately, to deem them timely-filed as I have just submitted them via the ECF system as documents number 11 and 12).

I was just recently retained to represent these defendants. It is arguable that these two filings are timely, as things stand, because I recently returned an executed waiver of service form to plaintiff and co-defendant Samuel Louis never properly served his cross-claims upon me or my clients, and did not e-file an affidavit of service. However, out of an abundance of caution, I am making this request. I would like to proceed as if these pleadings are timely-filed and there is no challenge made to sufficiency of service of process.

All other parties have consented to this request. No prior requests have been made. Thank you.

Respectfully,

s/Eric Dinnocenzo

Eric Dinnocenzo

So ordered:

By: _____
Hon. Douglas Arpert